

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

CANDLE BOGAMY, as next friend for U.M., a §
minor, M.M., a minor, and J.M., a minor, in their §
individual capacities and as heirs at law to the §
Estate of JULIUS MALOY, DECEASED; and §
WALTRINA MUKES-MALOY, in her §
individual capacity and as heir at law to the §
Estate of JULIUS MALOY, DECEASED, §
JULIUS MALOY, Sr., in his individual capacity §
and as heir at law to the ESTATE OF JULIUS § CIVIL ACTION NO. 2:11-CV-00088
MALOY, DECEASED, and LELA MAE §
MALOY, in her individual capacity and as heir §
at law to the ESTATE OF JULIUS MALOY, §
DECEASED §
§

Plaintiffs

v. §
§
§

HARRISON COUNTY, PAULA MOOTY,
PEGGY PERKINS, ERIS SLADE, JOHN,
HAIN, WILLIAM T. McCOOL, EDWARD
WEBSTER, CRUZ VANCES, GLOBAL TEL
LINK CORPORATION, PUBLIC
COMMUNICATION SERVICE, INC., AGM
TELECOM CORPORATION and AGM
TELECOM

Defendants

**MOTION TO DEPOSIT FUNDS INTO THE REGISTRY OF THE COURT
FOR THE BENEFIT OF U.M., M.M. AND J.M., MINORS**

COME NOW CANDLE BOGAMY, as next friend for U.M., a minor, M.M., a minor,
and J.M., a minor, in their individual capacities and as heirs at law to the Estate of JULIUS
MALOY, DECEASED, and Kurt Truelove, Guardian Ad Litem for said minors, and
hereby bring this Motion to Deposit Funds into the Registry of the Court for the Benefit
of U.M., M.M. and J.M., Minors, and would respectfully show the Court the following:

I.

This Honorable Court approved settlement in the above-styled cause on March 11, 2013. Under the settlement, U.M., M.M. and J.M. were each awarded the sum of \$27,344.56 and the following amounts were authorized to be distributed to their mother for justifiable expenses: \$2,300 for U.M.; \$1,000 for M.M.; and \$600 for J.M.

Accordingly, Movants request that the money awarded to U.M., M.M. and J.M. be held in trust by the Court, until such time as each said minor reaches majority. Movants herein request that these sums be deposited into the Registry of the Court and invested in the manner set forth in the attached order.

WHEREFORE, PREMISES CONSIDERED, Movants request that this Honorable Court grant this Motion, and for such other and further relief to which Movants may show that they are justly entitled.

Respectfully submitted,

THE EDWARDS LAW FIRM
The Haehnel House
1101 E. 11th Street
Austin, Texas 78702
Tel. 512-623-7727
Fax. 512-623-7729

By /s/ Jeff Edwards
JEFF EDWARDS
State Bar No. 24014406

Michael Bernoudy
2400 W. Grand Avenue
Marshall, Texas 76570
Tel. (903) 935-4223
Fax. (903) 935-4228

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

By my signature above, I hereby certify that on the 2nd day of May, 2013, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Robert S. Davis
Chad C. Rook
Flowers Davis, P.L.L.C.
1021 ESE Loop 323, Suite 200
Tyler, Texas 75701

Peter S. Wahby
Charlie Floyd
Greenberg Traurig
2200 Ross Avenue, Suite 5200
Dallas, Texas 75201